

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

GREG ADKISSON, et al.,)	
Plaintiffs,)	
v.)	No. 3:13-CV-00505-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	<i>Lead case consolidated with</i>
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KEVIN THOMPSON, et al.,)	
Plaintiffs,)	
v.)	No. 3:13-CV-00666-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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JOE CUNNINGHAM, et al.,)	
Plaintiffs,)	<i>as consolidated with</i>
v.)	No. 3:14-CV-00020-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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BILL ROSE,)	
Plaintiff,)	
v.)	No. 3:15-CV-00017-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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CRAIG WILKINSON, et al.,)	
Plaintiffs,)	
v.)	No.: 3:15-CV-00274-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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ANGIE SHELTON, as wife and next of kin)	
on behalf of Mike Shelton, et al.,)	
Plaintiffs,)	
v.)	No.: 3:15-CV-00420-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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JOHNNY CHURCH,)	
Plaintiff,)	
v.)	No.: 3:15-CV-00460-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	

DONALD R. VANGUILDER, JR.,)	
Plaintiff,)	
v.)	No. 3:15-CV-00462-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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JUDY IVENS, as sister and next of kin,)	
on behalf of JEAN NANCE, deceased,)	
Plaintiff,)	
v.)	No. 3:16-CV-00635-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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PAUL RANDY FARROW,)	
Plaintiff,)	
v.)	No. 3:16-CV-00636-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
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**DECLARATION OF JEREMY S. SMITH IN SUPPORT OF JACOBS ENGINEERING
GROUP INC.'S BRIEF REGARDING PHASE II PROCEDURES**

I, Jeremy S. Smith, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted *pro hac vice* in the Eastern District of Tennessee. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Defendant Jacobs Engineering Group Inc. in the above-captioned matter. I make this Declaration in support of Jacobs' Brief Regarding Phase II Procedures and Supporting Exhibits. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit A are true and correct copies of documents produced by Plaintiffs in this action.

3. Attached hereto as Exhibit B is a true and correct copy of a document produced by Plaintiffs in this action that is Bates-stamped PLA027906.

4. Attached hereto as Exhibit C are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA027707–08.

5. Attached hereto as Exhibit D is a true and correct copy of an interrogatory response by an individual Plaintiff in this action.

6. Attached hereto as Exhibit E are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA053056–58.

7. Attached hereto as Exhibit F are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA53052–53.

8. Attached hereto as Exhibit G are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA053075–76.

9. Attached hereto as Exhibit H are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA0072433–45.

10. Attached hereto as Exhibit I is a true and correct copy of a document produced by Plaintiff in this action that is Bates-stamped PLA007251.

11. Attached hereto as Exhibit J are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA007236–42.

12. Attached hereto as Exhibit K are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA007252–53.

13. Attached hereto as Exhibit L are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA006188–99.

14. Attached hereto as Exhibit M are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA051587–88, PLA051590, and PLA051882–85.

15. Attached hereto as Exhibit N is a true and correct copy of a deposition transcript of an individual Plaintiff in this action.

16. Attached hereto as Exhibit O are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped TUA REQ 000001–02 and TUA REQ 000039–40.

17. Attached hereto as Exhibit P are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped SMG-OR REQ 000001–02 and SMG-OR REQ 000072–78.

18. Attached hereto as Exhibit Q are true and correct copies of documents from Roane County Family Practice that were produced by Plaintiffs in this action.

19. Attached hereto as Exhibit R are true and correct copies of documents from Statcare Pulmonary Consultants, P.C. that were produced by Plaintiffs in this action.

20. Attached hereto as Exhibit S are true and correct copies of documents produced by Plaintiffs in this action that are Bates-stamped PLA071104–32.

21. Attached hereto as Exhibit T are true and correct copies of documents from James H. Quillen VA Medical Center that were produced by Plaintiffs in this action.

22. Attached hereto as Exhibit U is a true and correct copy of a deposition transcript of an individual Plaintiff in this action.

23. Exhibits A, O–R, and T were produced by Plaintiffs in this action via medical records providers Black Oak Services and/or RAS Records Acquisition Services, Inc. Exhibits B–C, E–M, and S were produced directly by Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on March 31, 2020 in Los Angeles, California.



Jeremy S. Smith